This public comment serves to memorialize publicly the following:

- The CFO of OneCare VT acknowledges the ACO has not tracked \$10.5mm in Federal, State and Commercial rate payer funds intended specifically, contractually to support primary care practices.
- 2. The Chair of GMCB states on camera, on record his understanding from querying the hospitals that these funds did not in fact go to PCP practices, but instead, were absorbed into more broad "general operations" of the hospitals.
- 3. Vermont has a well-documented, crisis pre-dating Covid, in access to primary care, with the GMCB chair himself opining publicly in past meetings his own struggles to access same. Concurrently, as pointed out by the GMCB Chair the ACO benchmarking report underscores low marks for PCP access, while other data available to GMCB highlights inordinately high reliance on ER's for non-emergency care.
- 4. The Health Care Advocate, a party to the All Payer Model has called out all of the foregoing and intimated this is a matter of "enforcing law".

